

TRULINCS 54652509 - PARVIZ, MAHSA - Unit: SET-D-A

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DATE: 09/04/2023 06:26:28 PM

MAHSA PARVIZ
P.O. Box 13900
Seattle, WA 98198
mparviz@linkedup.vip
(972) 375-1202
Petitioner

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MAHSA PARVIZ,) Case No. 2:23-cv-00_____
Petitioner,)
v.)
H. BARRON) PETITION FOR WRIT OF
Warden,) HABEAS CORPUS UNDER
Federal Detention Center SeaTac,) 28 U.S.C. SEC. 2241,
) REQUEST FOR EXPEDITED
) CONSIDERATION, MOTION
) FOR APPOINTMENT OF
C. PETERS) COUNSEL
Director,)
Bureau of Prisons,)
Respondents.)
)



FEB 15 2024

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BY

Comes now, MAHSA PARVIZ, Petitioner, and files this Petition for Writ of Habeas Corpus under 28 U.S.C. Sec. 2241, Request for Expedited Consideration, and Motion for Appointment of Counsel.

I. PARTIES

1.1 Petitioner MAHSA PARVIZ is in the custody of the Bureau of Prisoners, at the Federal Detention Center SeaTac in Seattle, Washington.

1.2 Respondent HOWARD BARRON is the Warden of Federal Detention Center SeaTac, located within the Western District of Washington and the jurisdiction of this Court, and is named in his official capacity.

1.3 Respondent, through the Bureau of Prisons, an agency of the United States Department of Justice, is responsible for petitioner's custody and administration of their term of incarceration, including the application of earned time credits.

II. JURISDICTION

2.1 This Court has jurisdiction over this action pursuant to 28 U.S.C. Sec. 2241, because Petitioner's term in custody is being executed in a manner that exceeds the lawful sentence and violates the Constitution and laws of the United States.

2.2 This Court also has jurisdiction over this action pursuant to the constitutional writ of habeas corpus and the Court's ancillary jurisdiction over management of its proceedings, vindication of its authority, and effectuation of its decrees. See, e.g., Boumediene v. Bush, 553 U.S. 723, 729 (2008).

2.3 Petitioner invokes the jurisdiction of this Court pursuant to 28 U.S.C. Sec. 1331 and 28 U.S.C. Sec. 1404 because the action arises out of the Constitution and laws of the United States and seeks corrective action by officers and employees of the United States in their official capacity.

2.4 Petitioner invokes the jurisdiction of this Court pursuant to 28 U.S.C. Sec. 1343(a)(4) because she seeks to redress the deprivation of their rights guaranteed by both the Constitution and federal statutes.

DETENTION CENTER
AHSA PARVIZ
52509 UNIT: DA
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A. 98198-1090

SEATTLE WA 980

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WESTERN DISTRICT OF WASHINGTON

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US District Court
ATTN: Clerk (for filing in 2:23-cv-01407-JHC-DWC,
and same day, ex parte consideration
under LCR 7(d)(1), and for Lyndsie Schmalz
in suite 5220)

700 Stewart St
Seattle, WA 98101
98101-443999